



Filed by: Tennessee Cellular Telephone Co.
% Petr Valkoun
400 Northridge Road, Suite 130
Atlanta, GA 30350

Date: September 2005

To: Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

By Electronic Submission:

Michael Wilhelm, Chief
Public Safety and Critical Infrastructure Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Kris Monteith, Acting Bureau Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mr. Jeffrey Cohen
Public Safety and Critical Infrastructure Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554



Tennessee Cellular Telephone Co. ("TCTC") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 7709, 7771 ¶172 (2005) ("*Order*").

Carrier Identifying Information:

Carrier Name: Tennessee Cellular Telephone Co. – FRN 0005-9386-59

E911 Compliance Officer: Petr Valkoun
400 Northridge Road, Suite 130
Atlanta, GA 30350

E911 Implementation Information:

TCTC is operating as a "carriers' carrier", *i.e.*, TCTC serves only the customers of other carriers. Thus, TCTC has no subscribers and will not have any subscribers. Based on this premise, TCTC hereby reports as follows:

- TCTC still has not received any Phase I or Phase II E911 requests from PSAPs. TCTC has obtained and installed all of the equipment and software necessary to meet any Phase I request it may receive from a PSAP, but will have to work with a local exchange carrier ("LEC") to have a landline installed between the switch and a requesting PSAP for Phase I deployment when the time comes. It could take a LEC as long as 12 or even 18 months to install a new landline in the rural areas where CFC is operating.
- TCTC has no subscribers, thus TCTC does not have the means to fund any Phase I or Phase II implementation and recurring costs via pass-throughs to subscribers. Because TCTC has not yet received any Phase I or Phase II requests, to date it has not explored the availability of any state or local cost recovery programs for E-911 implementation. In anticipation of receiving a Phase I request, TCTC is beginning its research into the availability of such cost recovery programs.
- TCTC elected a handset-based solution for Phase II E-911. TCTC is using analog and TDMA technology only at its cell sites and has determined that, for economic reasons, it will not be adding GSM overlays to its cells at this time. TCTC continues to anticipate a significant problem with its Phase II E-911 deployment. There is currently no Phase II-compliant handset-based solution available for TDMA, and it appears from all available market information that one will not become available any time in the near future.

- Moreover, as previously reported, TCTC remains unable to switch to a network-based Phase II solution, because it is technically impossible. The only Phase II-compliant network-based solutions available are based on either triangulation techniques, which can work only when the network is receiving location information on the involved mobile unit from three different cell sites, or angle of arrival techniques (“AOA”), which can work only when the network is receiving location information from at least two different cell sites.

TCTC operates only in a remote, rural area. TCTC is operating a single cell and, thus, TCTC’s service area is not susceptible to either triangulation or AOA techniques. Therefore, TCTC is not able to implement Phase II E911, and even if it did it would never be able to reach the required 95% accuracy level on a system-wide basis, as prescribed by §20.18 of the Commission’s rules.

- For the reasons discussed above pertaining to the permanent absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond TCTC’s control, TCTC does not anticipate that full Phase II service will be available in its network any time in the near future. TCTC is continuing to monitor the marketplace for new technology that will provide adequate Phase II E-911 service to rural markets.
- With regard to meeting the ultimate implementation date of December 31, 2005, see above.